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11 UNITED STATES BANKRUPTCY COURT
12 WESTERN DISTRICT OF WASHINGTON, SEATTLE DIVISION

13 In re:

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15 WASHINGTON FIRST FINANCIAL
16 GROUP, INC.,

17 Debtor.
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No. 16-12848-TWD

[PROPOSED] ORDER (1) APPROVING
DEBTOR'S DISCLOSURE STATEMENT
AND ANY AMENDMENTS THERETO; (2)
APPROVING THE NOTICE AND
OBJECTION PROCEDURES IN RESPECT
OF CONFIRMATION OF DEBTOR'S PLAN
OF LIQUIDATION AND ANY AMENDMENTS
THERETO; (3) APPROVING SOLICITATION
PACKAGES AND PROCEDURES FOR
DISTRIBUTION THEREOF; AND (4)
APPROVING THE FORM OF BALLOT AND
ESTABLISHING PROCEDURES FOR
VOTING ON THE PLAN OF LIQUIDATION

24 THIS MATTER came before the Court for consideration of the Motion of Washington
25 First Federal Group, Inc. ("Debtor"), Debtor and Debtor-in-Possession in the above-captioned
26

ORDER GRANTING FINAL APPROVAL OF
DISCLOSURE STATEMENT - 1

OLES MORRISON RINKER & BAKER LLP
701 PIKE STREET, SUITE 1700
SEATTLE, WA 98101-3930
PHONE: (206) 623-3427
FAX: (206) 682-6234

1 Chapter 11 case pursuant to Sections 1125, and 1128 of Title 11 of the United States Code (the
2 “Bankruptcy Code”), Rules 2002, 3016, 3017, 3018, and 3020 of the Federal Rules of
3 Bankruptcy Procedure (the “Bankruptcy Rules”) and Rules 3017-1 and 3020-1 of the Local
4 Bankruptcy Rules for the United States Bankruptcy Court for the Western District of Washington
5 at Seattle (the “Local Rules”), seeking entry of an order: (i) approving the Disclosure Statement
6 for the Plan of Liquidation proposed by the Debtor, filed July 6, 2016 (the “Disclosure
7 Statement”); (ii) approving the notice of the hearing and objection procedures in respect to
8 confirmation of the Plan and setting the date for the hearing on confirmation of the Plan; (iii)
9 approving solicitation packages and the procedures for distribution thereof; (iv) approving the
10 form of ballots and establishing procedures for voting on the Plan (the “Motion”). The Court
11 having jurisdiction to consider the Motion and the relief requested herein in accordance with 28
12 U.S.C. §§ 157 and 1334; and in consideration of the Motion and the relief requested therein
13 being a core proceeding pursuant to 28 U.S.C. § 157(b); venue being proper before this Court
14 pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been
15 provided to (i) all creditors and other parties in interest listed in the mailing matrix for the above-
16 captioned case, including holders of claims who filed with the Court and served a copy on
17 counsel for the Debtor a request for special notice; and (ii) the Office of the United States
18 Trustee; ((i) through (ii) being collectively referred to as the “Noticed Parties”); and it appearing
19 that no other or further notice need be provided; and a hearing having been scheduled before
20 the Court with respect to the Motion on **August 5, 2016** (the “Hearing”); and the Court having
21 determined that the legal and factual bases set forth in the Motion establish cause for the relief
22 granted herein; and no objections having been filed with respect to the relief requested, or any
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1 objection filed having been either resolved or being hereby overruled; and after due deliberation
2 and sufficient cause appearing, therefore, IT IS HEREBY FOUND THAT:

3 A. The Disclosure Statement contains adequate information within the meaning of
4 Section 1125 of the Bankruptcy Code.

5 B. The Notice of Hearing on Approval of Disclosure Statement and subsequent
6 amended notices (collectively, the "Disclosure Statement Notice"), and the deadline for filing
7 objections to the Disclosure Statement was provided to the Noticed Parties, and such notice
8 constitutes good and sufficient notice to all interested parties.

9 C. The form and manner of notice of the time set for filing objections to, and the time,
10 date, and place of, the Hearing to consider the approval of the Disclosure Statement was
11 adequate and comports with due process.

12 D. The form of the ballot (the "Ballot"), substantially in the form annexed hereto as
13 Exhibit A is sufficiently consistent with Official Form No. 14 and adequately addresses the
14 particular needs of this Chapter 11 case and is appropriate for each class of claims entitled to
15 vote to accept or reject the Plan.

16 E. The period, set forth below, during which the Debtor may solicit acceptances to the
17 Plan is a reasonable period of time for entities entitled to vote on the Plan to make an

18 F. The procedures for the solicitation and tabulation of votes to accept or reject the Plan
19 (as set forth below) provide for a fair and equitable voting process and are consistent with
20 Section 1126 of the Bankruptcy Code.

21 G. The procedures set forth below regarding notice to all parties in interest of the time,
22 date, and place of the hearing to consider confirmation of the Plan (the "Confirmation Hearing")
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1 and the distribution and contents of the Solicitation Packages comply with Bankruptcy Rules
2 2002 and 3017 and constitute sufficient notice to all interested parties.

3 H. The Debtor has shown good cause for approval of the implementation of the
4 procedures described in the Motion.

5 NOW, THEREFORE, IT IS HEREBY ORDERED AS FOLLOWS:
6

7 1. The Motion is GRANTED in all respects.

8 2. The Disclosure Statement is APPROVED in all respects.

9 3. All objections, if any, to the Disclosure Statement that have not been otherwise
10 resolved are hereby overruled.

11 4. Capitalized terms used but not defined in this Order shall have the meaning ascribed
12 to them in the Motion.

13 5. The form of Ballot proposed by the Debtor is APPROVED.
14

15 6. The Confirmation Hearing will be held on September 23, 2016 at 9:30 a.m.; provided,
16 however, that the Confirmation Hearing may be adjourned or continued from time to time by the
17 Court or the Plan Proponents without further notice.

18 7. The notice (the "Confirmation Hearing Notice") of (i) the time fixed for filing objections
19 to confirmation of the Plan (the "Plan Objection Deadline") and (ii) the time, date, and place of
20 the Confirmation Hearing, substantially in the form annexed hereto as Exhibit B is APPROVED.
21

22 8. Any objections to confirmation of the Plan must be (i) be in writing, (ii) state the name
23 and address of the objecting party and the nature of the claim or interest of such party, (iii) state
24 with particularity the basis and nature of any objection, and (iv) be filed, together with proof of
25 service, with the Court, and be served so as to be actually filed and received no later than **5:00**
26

1 **p.m. (prevailing Pacific Time) on September 16, 2016**, by (i) Jeffrey L. Smoot, Oles Morrison
2 Rinker & Baker LLP, 701 Pike Street, Suite 1700, Seattle, WA 98101; and (ii) the Office of the
3 U.S. Trustee, Attn: Hilary Mohr, 700 Stewart Street, Suite 5103, Seattle, WA 98101.

4 Objections to confirmation of the Plan that are not timely filed, served, and actually
5 received in the manner set forth above shall not be considered and shall be deemed overruled.

6
7 9. The Debtor is authorized to file replies or responses to any objections by September
8 20, 2016.

9 10. The Debtor shall complete the mailing of the Solicitation Packages (as defined in
10 Paragraph 11 below) on or before August 16, 2016 (the "Solicitation Date").

11 11. The Debtor shall distribute, or cause to be distributed by no later than the Solicitation
12 Date, (i) the Disclosure Statement Order (excluding the exhibits thereto), (ii) the Confirmation
13 Hearing Notice, (iii) the Disclosure Statement (together with the Plan annexed thereto), and (iv)
14 such other materials as the Court may direct ((i), (ii), (iii), and (iv) referred to collectively as the
15 "Solicitation Package") to (i) the U.S. Trustee, (ii) all creditors in Classes 1-7 of the Plan, and (iii)
16 all parties having filed requests for notices in the case.
17

18 12. All Ballots must be properly executed, completed, and delivered to the Debtor's
19 attorney by first-class mail, overnight courier, or personal delivery or facsimile or email so that
20 they are actually received by the Debtor's attorney no later than 5:00 p.m. prevailing Pacific
21 Standard Time on September 16, 2016 (the "Voting Deadline").
22

23 13. The amount and classification of a claim for purposes of voting on the Plan shall be
24 determined as follows:
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1 (a) If a proof of claim has not been timely filed (i.e., was not filed by the
2 applicable Bar Date), the amount of the claim shall be equal to the amount, if any, listed
3 in respect of such claim in the Debtor's bankruptcy schedules and/or statement of
4 financial affairs (as may be amended from time to time, the "Schedules"), to the extent
5 such claim is not listed as contingent, unliquidated, undetermined or disputed (subject to
6 any applicable limitations set forth below). Such claim shall be placed in the appropriate
7 class of the Plan based upon the Debtor's records and the classification scheme set
8 forth in the Plan.
9

10 (b) If a proof of claim has been timely filed for a liquidated, non-contingent, non-
11 disputed claim, and has not been objected to by August 16, 2016, the amount and
12 classification shall be that specified in such proof of claim for voting purposes only and
13 shall not be binding for any other purpose, subject to any applicable limitations set forth
14 below.
15

16 (c) A claim which is the subject of an objection filed by August 16, 2016, and not
17 resolved by the Voting Deadline shall be disallowed for voting purposes, except to the
18 extent and manner that: (i) may be set forth in the objection; and (ii) such claim may be
19 temporarily allowed for voting purposes in accordance with Bankruptcy Rule 3018 and
20 the procedures set forth below.
21

22 (d) If a claim has been estimated or otherwise allowed for voting purposes by
23 order of the Court, the amount and classification shall be that set by the Court.
24

25 (e) Creditors shall not be entitled to vote claims to the extent such claims
26 duplicate or have been superseded by other claims timely filed by or on behalf of such

1 creditors. The Debtor shall determine, in his discretion, whether a claim is duplicative or
2 has been superseded for voting purposes only.

3 14. Creditors must vote all of their claims within a particular class under the Plan either
4 to accept or reject the Plan and may not split their vote(s) and, thus, a Ballot that partially rejects
5 and partially accepts the Plan shall not be counted, provided, however, that a creditor with
6 claims in more than one class shall be entitled to vote its claims differently in one class from
7 another.
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9 15. In the event a creditor casts more than one Ballot voting the same claim(s) before
10 the Voting Deadline, the last Ballot received before the Voting Deadline is deemed to reflect the
11 voter's intent, and thus, supersedes any prior Ballots.
12

13 16. The following types of Ballots will not be counted in determining whether the Plan
14 has been accepted or rejected: (i) any Ballot that is properly completed, executed, and timely
15 returned to the Debtor's attorney but does not indicate an acceptance or rejection of the Plan, or
16 that indicates both an acceptance and rejection of the Plan; (ii) any Ballot received after the
17 Voting Deadline unless the Debtor shall have granted an extension of the Voting Deadline in
18 writing with respect to such Ballot; (iii) any Ballot that is illegible or contains insufficient
19 information to permit the identification of the claimant; (iv) any Ballot cast by a person or entity
20 that does not hold a claim in a class that is entitled to vote to accept or reject the Plan; (v) any
21 unsigned Ballot or Ballot which does not contain a signature; (vi) any Ballot cast by a creditor
22 whose claim either is not listed, or is listed as "zero" or "unknown" amount (or similarly listed), or
23 is listed as a disputed, contingent, or unliquidated claim on the Schedules, for which no proof of
24 claim was timely filed; and (vii) any Ballot cast by a creditor whose claim either is not listed, or is
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1 listed as “zero” or “unknown” amount (or similarly listed), or is listed as a disputed, contingent, or
2 unliquidated claim on the Schedules, for which a proof of claim is timely filed but for which the
3 holder did not obtain an order temporarily allowing its claim in accordance with this order.

4 17. The following procedures shall apply for temporary allowance motions, pursuant to
5 Bankruptcy Rule 3018(a), with respect to voting on the Plan. The Debtor will file objections to
6 claims for voting purposes and certain other substantive purposes by August 16, 2016 (the
7 “Claims Objection Deadline”). If an objection for voting purposes is filed on or before the Claims
8 Objection Deadline, the relevant claimant will not be entitled to vote on the Plan, unless such
9 claimant files a motion on or before August 23, 2016 (the “Temporary Allowance Deadline”)
10 seeking temporary allowance of its claim for voting purposes only and obtains an order from the
11 Court granting such motion, or such objection is withdrawn. The Court will conduct a hearing
12 beginning on September 9, 2016, at 9:30 a.m. (the “Temporary Allowance Motion Hearing
13 date”) to consider all temporary allowance motions. A temporary allowance motion is required to
14 set forth with particularity the amount and classification at which such claimant believes its claim
15 should be allowed for voting purposes and the evidence in support of that belief, otherwise such
16 motion shall be deemed invalid. Such motions may be heard on shortened time on September 9,
17 2016, without the need to file a motion to shorten time.

18 18. If this Court has not temporarily allowed all or a portion of such claim for voting
19 purposes pursuant to Bankruptcy Rule 3018(a) on or before the Temporary Allowance Motion
20 Hearing Date such claim shall not be counted for voting purposes.

21 19. If a creditor reaches an agreement with the Debtor as to the amount and
22 classification of its otherwise disputed claim, for voting purposes, (i) a stipulation setting forth
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1 that agreement may be presented to the Court for approval by notice of a proposed stipulation
2 and order at or before the Confirmation Hearing; and (ii) subject to the Court's approval, such
3 claim will be counted for purposes of accepting or rejecting the Plan in the amount agreed to by
4 the Debtor and such creditor in the stipulation.

5
6 ///END OF ORDER///

7
8 Presented by:

9 OLES MORRISON RINKERBAKER LLP

10 /s/ Jeffrey L. Smoot
11 Jeffrey L. Smoot, WSBA #39335
12 Melia A. Preedy, WSBA #47940
13 Attorneys for Debtor
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EXHIBIT A

1 Jeffrey L. Smoot, WSBA #39335
2 Oles Morrison Rinker & Baker LLP
3 701 Pike Street, Suite 1700
4 Seattle, WA 98101
5 (206) 623-3427

Judge Timothy W. Dore
Chapter 11

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7
8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON, SEATTLE DIVISION

10 In re:

11 WASHINGTON FIRST FINANCIAL
12 GROUP, INC.,

13
14 Debtor.

No. 16-12848-TWD

BALLOT FOR ACCEPTING OR
REJECTING DEBTOR'S PLAN OF
LIQUIDATION

15 On May 31, 2016, Washington First Financial Group, Inc. ("WFFG" or "Debtor") filed with the
16 United States Bankruptcy Court for the Western District of Washington (the "Bankruptcy Court")
17 a proposed Plan of Liquidation (as may be amended from time to time, the "Plan") and a
18 proposed Disclosure Statement (as may be amended from time to time, the "Disclosure
19 Statement"). The Plan filed by WFFG can be confirmed by the Court if it is accepted by the
20 holders of two-thirds (2/3) in amount and more than one-half (1/2) in number of the holders of
21 claims or equity security holders in each class. In the event the requisite acceptances are not
22 obtained, the Court may nevertheless confirm the Plan if the Court finds that the Plan accords
23 "fair and equitable" treatment to the Class rejecting the Plan. "Fair and equitable" is defined in
24 11 U.S.C. § 1129(b).

25 This Ballot has been sent to you to solicit your vote regarding the acceptance or rejection of the
26 Plan. A copy of the Disclosure Statement (including a copy of the Plan annexed as Exhibit 1
thereto) is enclosed. To have your vote count, you must complete and return this Ballot.

IN ORDER FOR YOUR VOTE ON THE PLAN TO BE COUNTED, YOUR PROPERLY
COMPLETED BALLOT MUST BE ACTUALLY RECEIVED BY THE DEBTOR'S ATTORNEY **BY**
5:00 P.M., PREVAILING PACIFIC TIME, ON SEPTEMBER 16, 2016, UNLESS SUCH TIME IS
EXTENDED BY THE DEBTOR (THE "VOTING DEADLINE").

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701 PIKE STREET, SUITE 1700
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PHONE: (206) 623-3427
FAX: (206) 682-6234

BALLOT - 1

1 IF YOU HOLD A CLAIM OR INTEREST UNDER MORE THAN ONE CLASS, YOU MAY VOTE
2 EACH CLAIM OR INTEREST ON A SEPARATE BALLOT.

3 **BALLOT**

4 Holders of **all Claims and Equity Interests** entitled to vote must complete **all**
5 sections of the ballot and the signature block of this ballot form and return the
6 ballot before **Friday, September 16, 2016**:

7 1. The undersigned, holder of (check one):

8 ☐ Class 1: Secured Claims

9 ☐ Class 2: Allowed Unsecured Claims

10 ☐ Class 3: Equity Security Holders

11 ☐ Class 4: Insider Indemnification Claims

12 2. In the amount of \$ _____

13 3. Hereby (check one)

14 ☐ ACCEPTS ☐ REJECTS the Plan of Liquidation.

15 Date: _____ Signature: _____

16 Print or Type Name of Claimant: _____

17 Street Address: _____

18 City, State, Zip Code and Country: _____

19 Telephone Number: _____

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VOTING INSTRUCTIONS FOR COMPLETING THE BALLOT

1. This Ballot is submitted to you to solicit your vote to accept or reject the Debtor's Plan. The terms of the Plan are described in the Disclosure Statement. All capitalized terms used but not defined herein or in the Ballot have the meanings ascribed to such terms in the Plan or the Disclosure Statement. **PLEASE READ THE PLAN AND THE DISCLOSURE STATEMENT CAREFULLY BEFORE COMPLETING THE BALLOT.**

2. The Plan of Liquidation filed by WFFG can be confirmed by the Court if it is accepted by the holders of two-thirds (2/3) in amount and more than one-half (1/2) in number of the holders of claims or equity security holders in each class. In the event the requisite acceptances are not obtained, the Court may nevertheless confirm the Plan and thereby make it binding on you if the Bankruptcy Court finds that the Plan does not unfairly discriminate against and accords fair and equitable treatment to the holders Claims or Equity Interests rejecting the Plan, and otherwise satisfies the requirements of section 1129(b) of the Bankruptcy Code. If the Plan is confirmed by the Bankruptcy Court, all holders of interests in, and any other holders of claims against, the Debtor (including those holders who abstain from voting on or reject the Plan, and those holders who are not entitled to vote on the Plan) will be bound by the confirmed Plan and the transactions contemplated thereby, whether or not they vote, and whether or not they accept the Plan.

3. In order for your vote on the Plan to be counted, you must complete, sign, and return this Ballot so that it is received by the Debtor's attorney, Jeffrey L. Smoot, Oles Morrison Rinker & Baker LLP, 701 Pike Street, Suite 1700, Seattle, WA 98101, by 5:00 P.M., prevailing Pacific Time, on September 16, 2016.

4. To complete the Ballot properly, you must follow the procedures described below:

- a. **Indicate which Class you are a member of by checking the appropriate box under Item 1 of the Ballot.**
- b. **Indicate the amount of your claim in Item 2 of the Ballot.**
- c. **Cast one vote to accept or reject the Plan by checking the appropriate box in Item 3 of the Ballot.**
- d. **If you are completing this Ballot on behalf of another person or entity, indicate your relationship with such person or entity and the capacity in which you are signing.**

OLES MORRISON RINKER & BAKER LLP
701 PIKE STREET, SUITE 1700
SEATTLE, WA 98101-3930
PHONE: (206) 623-3427
FAX: (206) 682-6234

1 e. If you hold Claims or Equity Interests in more than one Class, you may
2 receive more than one Ballot so that you can vote under each applicable
3 Class to which you belong. Your vote will be counted in determining
4 acceptance or rejection of the Plan by a particular Class only if you
5 complete, sign and return the Ballot for that Class.

6 f. Sign and date your Ballot, provide your name and mailing address, and
7 return your Ballot so it arrives no later than September 16, 2016 to:

8 Jeffrey L. Smoot
9 Oles Morrison Rinker & Baker LLP
10 701 Pike Street, Suite 1700
11 Seattle, WA 98101

12 g. If you submit more than one Ballot voting the same Claim prior to the
13 Voting Deadline, the last validly executed Ballot shall be counted.

14 h. If you believe that you have received the wrong Ballot, please contact the
15 Debtor's attorney immediately.

16 IF YOU HAVE ANY QUESTIONS REGARDING THIS BALLOT, OR IF YOU DID NOT
17 RECEIVE A RETURN ENVELOPE WITH YOUR BALLOT, OR IF YOU DID NOT RECEIVE A
18 COPY OF THE DISCLOSURE STATEMENT (INCLUDING THE PLAN), OR IF YOU NEED
19 ADDITIONAL COPIES OF THIS BALLOT OR OTHER ENCLOSED MATERIALS, PLEASE
20 CONTACT:

21 JEFFREY L. SMOOT
22 OLES MORRISON RINKER & BAKER LLP
23 701 PIKE STREET, SUITE 1700
24 SEATTLE, WA 98101
25 (206) 623-3427
26 smoot@oles.com

27 OLES MORRISON RINKER & BAKER LLP
28 701 PIKE STREET, SUITE 1700
29 SEATTLE, WA 98101-3930
30 PHONE: (206) 623-3427
31 FAX: (206) 682-6234

EXHIBIT B

1 Jeffrey L. Smoot, WSBA #39335
2 Oles Morrison Rinker & Baker LLP
3 701 Pike Street, Suite 1700
4 Seattle, WA 98101
5 (206) 623-3427

Judge Timothy W. Dore
Chapter 11
Hearing Date: September 23, 2016
Hearing Time: 9:30 a.m.
Location: Seattle, Room 8106
Response Deadline: September 16, 2016

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10 UNITED STATES BANKRUPTCY COURT
11 WESTERN DISTRICT OF WASHINGTON, SEATTLE DIVISION

12 In re:

13 WASHINGTON FIRST FINANCIAL
14 GROUP, INC.,

15 Debtor.
16

No. 16-12848-TWD

NOTICE OF HEARING REGARDING
DEBTOR'S MOTION TO CONFIRM
DEBTOR'S PLAN OF LIQUIDATION AND
APPOINT LIQUIDATING TRUSTEE

17
18 TO: All Creditors and Equity Security Holders;
19 TO: Parties Requesting Special Notice;
20 TO: The Clerk of the Court;
21 TO: The United States Trustee; and
22 TO: Other Parties Entitled to Notice.

23 PLEASE TAKE NOTICE that Washington First Financial Group, Inc. (the "Debtor") has
24 filed a motion for entry of an order confirming Debtor's Plan of Liquidation and Appointing a
25 Liquidating Trustee (the "Motion").

26 PLEASE TAKE FURTHER NOTICE that a hearing will be held on **Friday, September**

NOTICE OF HEARING TO CONFIRM DEBTOR'S PLAN
OF LIQUIDATION AND APPOINT LIQUIDATING
TRUSTEE - 1

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OLES MORRISON RINKER & BAKER LLP
701 PIKE STREET, SUITE 1700
SEATTLE, WA 98101-3930
PHONE: (206) 623-3427
FAX: (206) 682-6234

1 **23, 2016 at 9:30 a.m. (prevailing Pacific Time)**, before the Honorable Timothy W. Dore in
2 Room 8106, U.S. Courthouse, 700 Stewart Street, Seattle, Washington 98101.

3 IF YOU OPPOSE confirmation of the Plan, your objections must be (i) be in writing, (ii)
4 state the name and address of the objecting party and the nature of the claim or interest of such
5 party, (iii) state with particularity the basis and nature of any objection, and (iv) be filed, together
6 with proof of service, with the Court, and be served so as to be actually filed with the Bankruptcy
7 Court and received no later than **5:00 p.m. (prevailing Pacific Time) on September 16, 2016**
8 by (i) Jeffrey L. Smoot, Oles Morrison Rinker & Baker LLP, 701 Pike Street, Suite 1700, Seattle,
9 WA 98101; and (ii) the Office of the U.S. Trustee, Attn: Hilary Bramwell Mohr, 700 Stewart
10 Street, Suite 5103, Seattle, WA 98101. Objections to confirmation of the Plan that are not
11 timely filed, served, and actually received in the manner set forth above shall not be considered
12 and shall be deemed overruled.
13
14

15 Failure to comply with the foregoing may be deemed by the Court to be an admission
16 that the objection is without merit.

17 IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion,
18 GRANT THE MOTION, CONFIRM THE PLAN, AND APPOINT A LIQUIDATING TRUSTEE
19 WITHOUT FURTHER NOTICE, and strike the hearing.
20

21 Respectfully submitted this ____ day of August 2016.

22 OLES MORRISON RINKER & BAKER LLP

23 By: _____
24 Jeffrey L. Smoot, WSBA #39335
25 Attorneys for Debtor
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PROOF OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States of America that on the below date, I mailed a true correct copy of the following documents by postage pre-paid, regular first class mail or via Electronic Message through Electronic Case Filing to the Clerk of the Court, the Office of the United States Trustee, the Trustee if any, of the Debtor(s), and to all the parties listed on the attached mailing matrix:

1. NOTICE OF HEARING REGARDING DEBTOR'S MOTION TO CONFIRM DEBTOR'S PLAN OF LIQUIDATION AND APPOINT LIQUIDATING TRUSTEE;

2. DEBTOR'S MOTION TO CONFIRM DEBTOR'S PLAN OF LIQUIDATION AND APPOINT LIQUIDATING TRUSTEE;

3. DISCLOSURE STATEMENT AND ALL EXHIBITS THERETO INCLUDING PLAN OF LIQUIDATION;

4. ORDER (1) APPROVING DEBTOR'S DISCLOSURE STATEMENT AND ANY AMENDMENTS THERETO; (2) APPROVING THE NOTICE AND OBJECTION PROCEDURES IN RESPECT OF CONFIRMATION OF DEBTOR'S PLAN OF LIQUIDATION AND ANY AMENDMENTS THERETO; (3) APPROVING SOLICITATION PACKAGES AND PROCEDURES FOR DISTRIBUTION THEREOF; AND (4) APPROVING THE FORM OF BALLOT AND ESTABLISHING PROCEDURES FOR VOTING ON THE PLAN OF LIQUIDATION; and

5. BALLOT FOR ACCEPTING OR REJECTING DEBTOR'S PLAN OF LIQUIDATION.

NOTICE OF HEARING TO CONFIRM DEBTOR'S PLAN
OF LIQUIDATION AND APPOINT LIQUIDATING
TRUSTEE - 3

OLES MORRISON RINKER & BAKER LLP
701 PIKE STREET, SUITE 1700
SEATTLE, WA 98101-3930
PHONE: (206) 623-3427
FAX: (206) 682-6234

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2
3 DATED and signed on August ____, 2016 at Seattle, Washington.
4

5 OLES MORRISON RINKER & BAKER LLP
6

7 By: _____
8 Lessy A. Valdovinos
9 Document Clerk
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